Comments on Our-Climate-Act / Draft-Scoping-Plan

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- In New York in 2020, approximately 35% of the total electricity generated was from gas and/or oil while less that 4% of NY total Electric comes from wind & solar, according to New York Independent System Operator (NYSIO)
- Sources of summer electric c generation capability that can be called upon to generate when electricity is needed during the hot summer months include:
    - Gas & oil (68%)
    - Nuclear (12%
    - Hydro (11%)
    - Wind (5%)
    - Solar (1%)

  Of these energy generation sources, 68% is gas & oil and less than 6% are wind & Solar. (Source, 2021 NYISO Gold Book, page 105)

- In 2019 New York passed the Climate Leadership and Community Protection Act (CLCPA) which, among other things, requires that by 2030 (8 years from now), 70 % of the state's electricity come from renewable sources (wind & solar) with 100% zero emission Electricity by 2040.
- That is an ambitious target and several studies have been performed (by NYISO and others) to assess how much additional renewable power would be needed to meet the 2040 target. Some estimates are as high as 96 gigawatts (GW) of solar & wind in 2040 compared to the approximately 2 GW of solar & wind presently installed.
- Currently approved NYSERDA Approved projects would generated from both wind & solar totals of 10GWs by 2025 and 13GWs by 2030. There would be significant target shortfalls by 2030 and without tremendous increases in wind & solar generation project between 2030 & 2040 huge challenges over the next few decades.
- Where will the new renewable generation be located? What will their impact on the environment be?
- How will these renewable system perform over the long term, particularly in extreme weather conditions (winter with limited sunlight & extreme cold/heat conditions)

- Widespread electric outages in Texas this past winter highlight that these are real concerns with real impacts on residents.
- Cost is also a concern.
- The cost of the transition to these modes of generation (solar & wind in particular) could be quite expensive with generation, transmission and storage & potential rebuild of portion of the electric distribution system to handle expected increased load.
- Another cost concern is the potential upgrades to homes & industrial electric service lines and panel boxes, along with appliance conversion.
- A recent study conducted by Guidehouse suggested a statewide capital expenditure build out of more than $200 Billion to support low carbon future. Those costs will need to the borne by someone & it's not unlikely that a good portion will be passed along to the end use consumer.
- We are less that 8 years away from 2030 and the approved renewable energy projects are only a fraction of what's needed to hit these goals.
- We need to put a plan in place to either modify the timeline in the Leadership and Community Protection Act (CLCPA) or include/increase the use of other Low-Carbon energy sources such as Natural Gas or Nuclear.

In conclusion:

We are very much against the elimination of the use of natural gas as part of this CLCPA for the above reasons and the obvious cost and aggressive timelines in this legislation. These costs will be borne by the **voting** public thru taxes, increased price of good (due to industrial conversion expenses) passed on to the consumer to say nothing of the increased cost of energy/utilities.

The current cost differences between electricity & gas is approximately 2 to 1. This move to renewables (solar & wind) with ultimately total conversion to all electric will impact budgets for families and businesses.

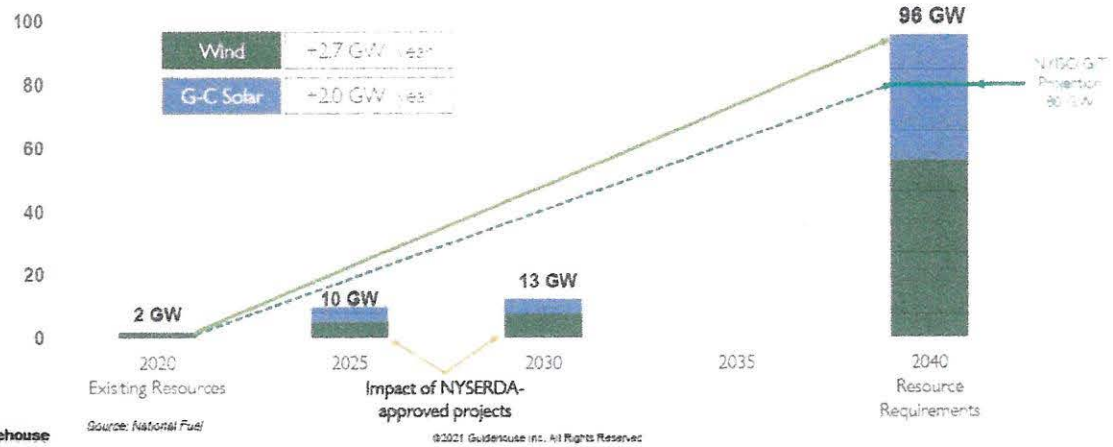
As a volunteer fireman of East Aurora Fire Department for 53 years, I have seen a lot of electric power disruptions. Had it not been for natural gas, there would have been significantly more devastation.

Reliance on one energy source (electric) will complicate the handling of disruption of service. In extreme climates (cold or hot) the need for backup forms of energy or sources is crucial. Currently we have those backups but a move to one energy type will eliminate this security.

Fundamental Challenges

Decarbonization requires material increases in renewable energy generation

Required Rate of New Resource Development in NY
2020 Analysis Group Study for NYISO Wind and Grid-Connected Solar



Source: National Fuel